

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division

ELIZABETH SINES, SETH WISPELWEY,
MARISSA BLAIR, TYLER MAGILL, APRIL
MUNIZ, HANNAH PEARCE, MARCUS
MARTIN, NATALIE ROMERO, CHELSEA
ALVARADO, and JOHN DOE

Plaintiffs,

v.

Civil Action No.: 3:17CV00072

JASON KESSLER, RICHARD SPENCER,
CHRISTOPHER CANTWELL, JAMES ALEX
FIELDS, JR., VANGUARD AMERICA,
ANDREW ANGLIN, MOONBASE
HOLDINGS, LLC, ROBERT "AZZMADOR"
RAY, NATHAN DAMIGO, ELLIOTT
KLINE a/k/a ELI MOSELEY, IDENTITY
EVROPA, MATTHEW HEIMBACH, MATTHEW
PARROTT a/k/a DAVID MATTHEW PARROTT,
TRADITIONALIST WORKER PARTY,
MICHAEL HILL, MICHAEL TUBBS, LEAGUE
OF THE SOUTH, JEFF SCHOEP, NATIONAL
SOCIALIST MOVEMENT, NATIONALIST
FRONT, AUGUSTUS SOL INVICTUS,
FRATERNAL ORDER OF THE ALT-KNIGHTS,
MICHAEL "ENOC" PEINOVICH, LOYAL
WHITE KNIGHTS OF THE KU KLUX KLAN,
and EAST COAST KNIGHTS OF THE KU KLUX
KLAN a/k/a EAST COAST KNIGHTS OF THE
TRUE INVISIBLE EMPIRE,

Defendants.

MOTION TO STAY DEPOSITION AND APPOINT GUARDIAN

COMES NOW JAMES ALEX FIELDS, by and through Counsel, hereby moves this Court to stay the deposition of James Alex Fields currently scheduled for February 25, 2021, and to appoint him a guardian *ad litem*, for reasons stated in his accompanying memorandum in support thereof.

Respectfully submitted,

JAMES ALEX FIELDS, JR.

By Counsel

/S/
David L. Hauck, Esquire (VSB# 20565)
David L. Campbell, Esquire (VSB #75960)
DUANE, HAUCK, GRAVATT & CAMPBELL
100 West Franklin Street
Richmond, Virginia 23220
Telephone: 804-644-7400
Facsimile: 804-303-8911
dcampbell@dhdglaw.com
Counsel for Defendant James A. Fields, Jr.

CERTIFICATE OF SERVICE

I hereby certify that on 22ND day of February, 2021, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Robert T. Cahill, Esquire
Cooley, LLP
11951 Freedom Drive, 14th Floor
Reston, Virginia 20190-5656
Counsel for Plaintiff

Roberta A. Kaplan, Esquire
Julie E. Fink, Esquire
Christopher B. Greene
Kaplan & Company, LLP
350 Fifth Avenue, Suite 7110
New York, New York 10118

Karen L. Dunn, Esquire
William A. Isaacson, Esquire
Boies Schiller Flexner LLP
1401 New York Ave, NW
Washington, DC 20005

Philip M. Bowman, Esquire
Boies Schiller Flexner LLP
575 Lexington Avenue
New York, New York 10022

Alan Levine, Esquire
Cooley LLP
1114 Avenue of the Americas, 46th Floor
New York, New York 10036

David E. Mills, Esquire
Cooley LLP
1299 Pennsylvania Avenue, NW
Suite 700
Washington, DC 20004

Kenneth D. Bynum, Esquire
BYNUM & JENKINS, PLLC
1010 Cameron Street
Alexandria, VA 22314

Pleasant S. Brodnax, III, Esquire
1701 Pennsylvania Ave., N.W.
Washington, D.C. 20006

Bryan Jones, Esquire
106 W. South St., Suite 211
Charlottesville, VA 22902
*Counsel for Defendants Michael Hill, Michael Tubbs, and
Leagues of the South*

Elmer Woodard, Esquire
5661 US Hwy 29
Blairs, VA 24527

and

James E. Kolenich, Esquire
9435 Waterstone Blvd. #140
Cincinnati, OH 45249
*Counsel for Defendants Schoepp, Nationalist Front,
National Socialist Movement, Matthew Parrott, Matthew*

Heimbach, Robert Ray, Traditionalist Worker Party, Elliot Kline, Jason Kessler, Vanguard America, Nathan Damigo, Identity Europa, Inc., and Christopher Cantwell

I further certify that on February 22, 2021, I also served the following non-ECF participants, via electronic mail as follows:

Christopher Cantwell
Christopher.cantwell@gmail.com

Robert Azzmador Ray
azzmador@gmail.com

Elliott Kline
Eli.f.mosley@gmail.com

Vanguard America c/o Dillon Hopper
Dillon_hopper@protonmail.com

Matthew Heimbach
Matthew.w.heimbach@gmail.com

Richard Spencer
richardbspencer@gmail.com

/S/

David L. Hauck, Esquire (VSB# 20565)
David L. Campbell, Esquire (VSB #75960)
DUANE, HAUCK, GRAVATT & CAMPBELL
100 West Franklin Street
Richmond, Virginia 23220
Telephone: 804-644-7400
Facsimile: 804-303-8911
dcampbell@dhdglaw.com
Counsel for Defendant James A. Fields, Jr.